

EXHIBIT 2

Notice of Motion and Opportunity to Object

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

Expedited Consideration Requested

**NOTICE OF DEBTOR CITY OF DETROIT'S MOTION *IN LIMINE*
TO EXCLUDE TESTIMONY OF SHARON MCPHAIL**

PLEASE TAKE NOTICE that on December 16, 2013, the Debtor, City of Detroit, filed its *Motion in Limine to Exclude Testimony of Sharon McPhail* (the "**Motion in Limine**") in the United States Bankruptcy Court for the Eastern District of Michigan (the "**Bankruptcy Court**") seeking entry of an order excluding the testimony of Sharon McPhail at the hearing on at the hearing (the "Hearing") on the Motion of Debtor for Entry of an Order (I) Authorizing the Assumption of that Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant to Rule 9019, and (III) Granting Related Relief [Docket Nos, 17, 157] (the "Assumption Motion") and the Motion of the Debtor for a Final Order Pursuant to 11U.S.C. §§ 105, 362, 364(c)(1), 364(c)(2), 364(e), 364(f), 503, 507(a)(2), 904, 921 and 922 (I) Approving Post-Petition Financing, (II) Granting Liens And Providing Superpriority Claim Status And (III) Modifying Automatic Stay [Docket No. 1520] (the "Post-Petition Financing Motion"), set to take place in the Bankruptcy Court on December 17, 2013.

PLEASE TAKE FURTHER NOTICE that **your rights may be affected** by the relief sought in the *Motion in Limine*. You should read these papers

carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the Debtor's Motion *in Limine*, or you want the Bankruptcy Court to consider your views on the Motion *in Limine*, by **January 2, 2014 at 4:00 p.m. (EDT)**¹ you or your attorney must:

1. File a written objection or response to the Motion *in Limine* explaining your position with the Bankruptcy Court electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:²

United States Bankruptcy Court
Theodore Levin Courthouse
231 West Lafayette Street
Detroit, MI 48226

You must also serve a copy of any objection or response upon:

Jones Day
51 Louisiana Ave. NW
Washington, D.C. 20001-2113
Attention: Gregory Shumaker

-and-

Pepper Hamilton LLP
Suite 1800, 4000 Town Center
Southfield, Michigan 48075
Attn: Robert Hertzberg and Deborah Kovsky-Apap

¹ Concurrently herewith, the Debtor is seeking expedited consideration and shortened notice of the Motion *in Limine* so that the Court may consider the Motion to exclude Ms. McPhail before she is called as a witness.

² A response must comply with F. R. Civ. P. 8(b), (c) and (e).

2. If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion *in Limine* and you will be served with a notice of the date, time and location of the hearing.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion *in Limine* and may enter an order granting such relief.

Dated: December 16, 2013

Respectfully submitted,

/s/ Deborah Kovsky-Apap
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**ATTORNEYS FOR THE CITY OF
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